

CHANDNI MACHINES LIMITED

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS

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CHANDNI MACHINES LIMITED

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS

[Pursuant to Regulation 9(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015]

1. INTRODUCTION

Securities Exchange Board of India (SEBI) vide its notification no. LAD-NRO/GN/2014-15/21/85 dated 15th January, 2015 had issued Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("**PIT Regulations**"). The same has been amended vide SEBI (Prohibition of Insider Trading) Regulations, 2018. As per the amendment Regulations, the Board of Directors of every listed entity shall formulate a code of conduct to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons.

The Board of Directors (the "Board") of Chandni Machines Limited ("the Company") has adopted this Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons ("the Code") to comply with the above requirements. This Code shall be effective from 1st April, 2019.

2. DEFINITION

- (a) "**Compliance Officer**" shall mean the Company Secretary of the Company for the purpose of administration of this Code.
- (b) "**Connected Person**" means :
- (i) any person any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
 - (ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established, -
 - (a) an immediate relative of connected persons specified in clause (i); or
 - (b) a holding company or associate company or subsidiary company; or
 - (c) an intermediary as specified in section 12 of the Act or an employee or director thereof; or
 - (d) an investment company, trustee company, asset management company or an employee or director thereof; or

- (e) an official of a stock exchange or of clearing house or corporation; or
 - (f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - (g) a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or (h). an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
 - (h) a banker of the company; or
 - (i) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent. of the holding or interest;
- (c) **“Designated Person”** shall mean and include:
- (i) promoters of the Company;
 - (ii) Directors of the Company;
 - (iii) Key Managerial Personnel (KMP) of the Company;
 - (iv) Support staff of the Company who have access to Unpublished Price Sensitive Information;
 - (v) Such other persons as may be notified by the Compliance Officer with approval of the Managing Director from time to time.
- (d) **“Director”** means a member of the Board of Directors of the Company.
- (e) **“Generally Available Information”** means information that is accessible to the public on a non-discriminatory basis.
- (f) **“Immediate Relatives”** means a spouse of a insider and includes parent, sibling, and child of such insider or of the spouse, any of whom is either dependent financially on such insider, or consults such insider in taking decisions relating to trading in securities.
- (g) **“Insider”** means any person who is:
- (i) a connected person; or
 - (ii) in possession of or having access to unpublished price sensitive information.
- (h) **“Legitimate Purpose”** shall have the meaning assigned to it under the Code of Practices and Procedure for Fair Disclosure of Unpublished Price Sensitive Information.
- (i) **“Promoter”** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.

- (j) **“Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof except units of a mutual fund.
- (k) **“Trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities include trading in derivatives of securities, and "trade" shall be construed accordingly;
- (l) **“Trading day”** means a day on which the recognized stock exchanges are open for trading.
- (m) **“Unpublished Price Sensitive Information”** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:
 - (i) financial results;
 - (ii) dividends;
 - (iii) change in capital structure;
 - (iv) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
 - (v) changes in Key Managerial Personnel.

3. ROLE OF COMPLIANCE OFFICER

The Compliance Officer shall report on insider trading to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee at such frequency as may be stipulated by the Board of Directors.

The Compliance Officer shall assist all employees in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company’s aforesaid Codes.

The Compliance Officer shall confidentially maintain a list of such securities as a “restricted list” which shall be used as the basis for approving or rejecting applications for preclearance of trades.

4. PROHIBITION ON COMMUNICATING AND PROCURING UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)

Insiders including Designated Persons shall maintain the confidentiality of all Unpublished Price Sensitive Information. Insiders including Designated Persons shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities of the Company. Following practices should be followed in this regard:

4.1 Need to Know

Unpublished Price Sensitive Information is to be handled on a "need to know" basis, i.e., Unpublished Price Sensitive Information should be disclosed only to those within the Company, where it is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of information

4.2 Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc. Files containing confidential information should be deleted / destroyed after its use. Shredder should be used for the destruction of physical files.

4.3 Chinese Wall

- a. To prevent the misuse of confidential information, the Company has laid down Chinese Wall procedures which separate those areas of Company that routinely have access to confidential information, considered "inside areas" from those which provide support services and teams of sales and marketing, considered "public areas".
- b. The employees in the inside area shall not communicate any Unpublished Price Sensitive Information to anyone in public area.
- c. The Company shall have process of maintaining securely, computer files containing confidential information and physical storage of documents relating to UPSI.
- d. All Unpublished Price Sensitive Information is to be handled on "need to know basis", i.e., Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
- e. All the non-public information directly received by any employee should immediately be reported to the head of the department. In exceptional circumstances employees from the public areas may be brought "over the wall" and given confidential information on the basis of "need to know" criteria, under intimation to the Compliance Officer.

5. TRADING PLAN

An insider shall be entitled to formulate a trading plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

Trading plan shall:

- i. not entail commencement of trading on behalf of the insider earlier than six months

- from the public disclosure of the plan;
- ii. not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
- iii. entail trading for a period of not less than twelve months;
- iv. not entail overlap of any period for which another trading plan is already in existence;
- v. set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
- vi. not entail trading in securities for market abuse.

The Compliance Officer shall consider the Trading Plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Regulations. Further pre-clearance of trades shall not be required for trade executed as per an approved trading plan.

Furthermore, trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any Unpublished Price Sensitive Information (UPSI) and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such UPSI becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the securities are listed.

6. TRADING WINDOW

6.1 The period prior to declaration of Unpublished Price Sensitive Information is particularly sensitive for transaction in the Company's securities. This sensitivity is due to the fact that the Designated Person will, during that period, often possess Unpublished Price Sensitive Information.

During such sensitive times, the Designated Persons will have to forgo the opportunity of trading in the Company's securities.

The Designated Person of the Company shall not deal in the Securities of the Company when the trading window is closed. The period during which the trading window is closed shall be termed as prohibited period.

6.2 Unless otherwise specified by the Compliance Officer, the Trading Window for dealing in securities of the Company shall be closed for the following purposes-

- (a) Declaration of Financial Results;
- (b) Declaration of Dividends;
- (c) Issue of securities by way of public/ rights/bonus etc.
- (d) Any major execution plans or execution of new projects;
- (e) Amalgamation, mergers, takeovers or buy-back;
- (f) Disposal of whole or substantially whole of the undertaking;
- (g) Any information which, if disclosed, in the opinion of the person disclosing the same is likely to materially affect prices of the securities of the Company.

6.3 The period of closing of trading window, except for clause 7.2 (a), shall be effective from the date on which the Company sends intimation to the Stock Exchange advising the date of the Board meeting, upto 48 hours after the Unpublished Price Sensitive Information is submitted to the Stock Exchange / made public.

6.4 All Designated Persons of the Company shall conduct all their dealings in the securities of the Company only during the free period and shall not deal in any transaction involving the purchase or sale of the Company's securities during the prohibited periods or during any other period as may be specified by the Company from time to time.

7. PRE-CLEARANCE OF TRADES

7.1 All Designated Persons of the Company and their immediate relatives who intend to deal in the securities of the company in excess of Rupees 10,00,000 whether in one or a series of transactions over any calendar quarter shall require prior clearance from the Compliance Officer. The Compliance Officer is authorised to change the limit of market dealing from time to time.

7.2 An application for pre-clearance of trade shall be made in the format set out in **Annexure-I**, as amended from time to time, to the Compliance Officer along with an undertaking in the format set out in **Annexure-II** in favour of the Company by such Designated Person incorporating, *inter-alia*, the following clauses as may be applicable:

- (a) That the Designated Person does not have any access or has not received "Unpublished Price Sensitive Information" up to the time of signing the undertaking.
- (b) That in case the Designated Person has access to or receives "Unpublished Price Sensitive Information" after signing of the undertaking but before the execution of the transaction he or she shall inform the Compliance Officer of the change in his position and that he or she would completely refrain from dealing in the securities of the Company till the time such information becomes public.

- (c) That he or she has not contravened the provisions of this Code or Regulations, as amended, from time to time.
- (d) That he or she has made a full and true disclosure in the matter.
- (e) The Compliance Officer shall on receiving an application provide the Designated Person with an acknowledgement on the duplicate of the application.
- (f) The Compliance Officer shall grant approval within 2 days from the date of acknowledgement in the format set out in **Annexure-III** .
- (g) The Compliance Officer shall retain copies of all applications and acknowledgements.
- (h) In exceptional circumstances consent may not be given if the Compliance Officer is of the opinion that the proposed trade is on the basis of possession of any Unpublished Price Sensitive Information. There shall be no obligation to give reasons for any withholding of consent.
- (i) If so requested by the Compliance Officer, the Designated Person must ensure that his stockbroker is authorised to disclose to the Company all matters relevant to his share dealings.

7.3 The Designated Person shall execute their order in respect of securities of the Company within one week after the approval of pre-clearance is given. If the order is not executed within one week after the approval is given, the Designated Person must pre-clear the transaction again.

7.4 Designated Persons executing pre-cleared Trades shall file within 2 working days of the execution of the Trade, the details of such Trade, with the Compliance Officer in the format set out in **Annexure IV** of this Code. In the event such Trade is not executed, a report to that effect shall be filed with the Compliance Officer also in the format set out in **Annexure IV** of this Code.

8. MINIMUM PERIOD FOR HOLDING OF SECURITIES

8.1 All Designated Persons who are permitted to Trade shall not enter into a contra Trade during the next 6 months following the prior Trade.

8.2 In case the contra trade is necessitated by emergency, the Compliance Officer may waive the holding period after recording in writing reasons in this regard provided such waiver does not amount to violation of the SEBI Regulations or this Code. Similarly in the case of emergency of Trade by a Compliance Officer, the Compliance Officer may obtain the waiver from the Managing Director or in his absence, the Chairman of the Board, provided that such waiver does not violate this Code or the SEBI Regulations. The application for waiver shall be made in the format prescribed in **Annexure -V** hereto.

8.3 If a contra-trade is executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

8.4 Contra Trade restrictions will not be applicable for trades pursuant to exercise of stock option.

9. DISCLOSURE OF PERSONAL INFORMATION

9.1 All Designated Persons shall be required to disclose the names and permanent Account Number or any other Identifier of the following persons on an Annual Basis:

- (a) Immediate Relatives;
- (b) Persons with whom the Designated Persons shares a material financial relationship
- (c) Phone, Mobile, Cell numbers of such persons.

9.2 All Designated Persons shall within 30 days of the adoption of this Code disclose the names of the educational institution from which they have graduated and names of their past employers.

9.3 For the purpose of this clause , “Material Financial Relationship” shall mean a relationship in which one person is a recipient of any kind of payment such as by way of loan or gift during immediately preceding twelve months, equivalent to atleast 25% of Designated Person’s annual income. However, relationships based on arm’s length transactions shall not be considered.

10. REPORTING REQUIREMENT FOR TRANSACTION IN SECURITIES

10.1 Initial Disclosure

- (a) The Promoters, member of the Promoter Group, Key Managerial Personnel and the Directors of the Company shall disclose their holding of Securities of the Company as on the date of the SEBI Regulations taking effect, to the Company within 30 (thirty) days in the format specified in **Annexure VI (Form A)** hereto;
- (b) Every person on appointment as a Director or Key Managerial Personnel of the Company or upon becoming a Promoter or member of Promoter Group shall disclose their holding of Securities of the Company as on the date of appointment or becoming a Promoter, to the Company within 7(seven) days of such appointment or becoming a Promoter, in the format specified in **Annexure VII (Form B)** hereto.

10.2 Continual Disclosure

- (a) All Promoters, member of Promoter Group, Directors, and Designated Persons of the Company shall disclose to the Company the number of Securities acquired or disposed off within 2 (two) Trading Days of such transaction, if the value of the Securities Traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates

to a traded value in excess of Rs. 10,00,000 or such other value as may be prescribed, in the format specified in **Annexure VIII (Form C)** hereto.

- (b) The Company shall notify the particulars of such Trading to the stock exchange on which the Securities of the Company are listed within 2 (two) Trading Days from the receipt of such disclosure or becoming aware of such information.

It is hereby clarified that the disclosure of the incremental transactions after any continual disclosure made under this sub- clause, shall be made when the transactions effected after the prior disclosure cross the threshold specified in this sub-clause above.

11. DISSEMINATION OF PRICE SENSITIVE INFORMATION

11.1 No information shall be passed by Designated persons by way of making a recommendation for the purchase or sale of securities of the Company.

11.2 Disclosures / dissemination of Price Sensitive Information with special reference to analyst, media persons and institutional investors.

11.3 The following guidelines shall be followed while dealing with analysts, media persons and institutional investors:

- Only public information to be provided;
- At least 2(two) company representatives be present at meetings with analysts, media persons and institutional investors;
- Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.
- Simultaneous release of information after every such meet.

12. PENALTY FOR BREACH OF THE CODE OF CONDUCT

12.1 The Designated Persons who violate the code of conduct shall be subject to disciplinary action by the Company that may include wage freeze, suspension, recovery and clawback etc. and shall be ineligible for future participation in Employees Stock Option Plan (ESOP).

12.2 In case the Company observes that there has been a violation of these regulations, they shall inform the Board promptly.

12.3 The action by the Company shall not preclude SEBI or other Regulatory authorities from taking any action against those who are found guilty of Insider trading.

13. INFORMATION TO SEBI IN CASE OF VIOLATION OF THE SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015

In case it is observed by the Company and / or Compliance Officer that there has been a violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Compliance Officer shall inform the SEBI promptly on becoming aware of the violations of the Regulations.

ANNEXURE-I
SPECIMEN OF APPLICATION FOR PRE-DEALING APPROVAL

Date:

To,
The Compliance Officer
Chandni Machines Limited
110, T.V. Industrial Estate,
52, S. K. Ahire Marg, Worli,
Mumbai- 400030

Dear Sir/ Madam,

Sub: Application for Pre-dealing approval in Securities of the company

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for prevention of Insider Trading, I seek approval to purchase/ sale/ subscription of.....equity shares of the Company as per details given below:

1	Name of the applicant	
2	Designation	
3	Number of securities held as on date	
4	Folio No. / DP ID / Client ID No.)	
5	The proposal is for	(a) Purchase of securities (b) Subscription to securities (c) Sale of securities
6	Proposed date of dealing in securities	
7	Estimated number of securities proposed to be acquired/subscribed/sold	
8	Price at which the transaction is proposed	
9	Current market price (as on date of application)	
10	Whether the proposed transaction will be through stock exchange or off-market deal	
11	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the form of Undertaking signed by me.

Yours Faithfully

(Signature of Employee)

ANNEXURE-II

**FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR
PRE CLEARANCE**

UNDERTAKING

To,
The Compliance Officer
Chandni Machines Limited
110, T.V. Industrial Estate,
52, S. K. Ahire Marg, Worli,
Mumbai- 400030

I, _____ of the Company residing at _____, am desirous of dealing in _____ shares of the Company as mentioned in my application dated _____ for pre-clearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information (as defined in the Company's Code of Conduct for prevention of Insider Trading (the Code) up to the time of signing this under taking.

In the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public.

I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.

I undertake to submit the necessary report within 02 days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.

I declare that I have made full and true disclosure in the matter.

Date:

Signature:_____

ANNEXURE-III
FORMAT FOR PRE- CLEARANCE ORDER

Date:

To,

Name: _____

Designation: _____

Place: _____

This is to inform you that your request for dealing in _____ (nos.) shares of the Company as mentioned in your application dated _____ is approved. Please note that the said transaction must be completed on or before _____ (date) that is within 7 days from today.

In case you do not execute the approved transaction /deal on or before the aforesaid date you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within 2 days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Yours faithfully,
For Chandni Machines Limited

COMPLIANCE OFFICER

Encl: Format for submission of details of transaction

ANNEXURE-IV

**FORMAT FOR DISCLOSURE OF TRADES EXECUTED/NOT EXECUTED AFTER
OBTAINING PRE-CLEARANCE**

Date:

To,
The Compliance Officer
Chandni Machines Limited
110, T.V. Industrial Estate,
52, S. K. Ahire Marg, Worli,
Mumbai- 400030

Dear Sir/ Madam,

I hereby inform that I

- have not bought / sold/ subscribed any securities of the Company
- have bought/sold/subscribed to _____ securities as mentioned below on ____ (date)

Name of holder	No. of securities dealt with	Bought/sold/ subscribed	DP ID/Client ID / Folio No	Price (Rs.)

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 years and produce to the Compliance officer / SEBI any of the following documents:

1. Broker's contract note
2. Proof of payment to/ from Brokers.
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction).

I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval. (*applicable in case of purchase / subscription*).

I declare that the above information is correct and that no provisions of the Company's Code and/or applicable laws/regulations have been contravened for effecting the above said transactions(s).

Signature: _____

Name:

Designation:

***Strike off whichever is not applicable.**

ANNEXURE-V

APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD

Date:

To,
The Compliance Officer
Chandni Machines Limited
110, T.V. Industrial Estate,
52, S. K. Ahire Marg, Worli,
Mumbai- 400030

Dear Sir/ Madam,

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and Escorts Limited Code of Conduct to Regulate, Monitor and Report Trading by Insiders, I _____ (name and designation of the Designated Person) had _____ (provide the details of purchase/sale/subscribe for shares as the case may be) _____ (number of securities) of the Company on _____ after obtaining pre-clearance on _____. The details of transaction executed were submitted on _____ (date) in format prescribed. I seek your approval to waive off the time restrictions and permit to execute a contra-trade for _____ (number of securities) of the Company due to _____ (valid reason(s) for executing contra trade).

I declare that I am not in possession of any Unpublished Price Sensitive Information (as defined under the Escorts Limited Code of Conduct to Regulate, Monitor and Report Trading by Insiders) up to the date of this application.

I further declare that in case I have access to any Unpublished Price Sensitive Information after the signing of this application and before executing a contra- trade (if permitted), I shall:

1. Promptly inform the Compliance Officer
2. Refrain from trading in securities of the Company.

Yours truly,

Signature: _____

Name:

Designation:

Date:

Place:

- Encl.: 1. Copy of pre-clearance approval
2. Copy of execution of previous trade

**ANNEXURE- VI
(FORM A)**

FORMAT FOR INITIAL DISCLOSURE OF SECURITIES

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015
[Regulation 7(1) (a) read with Regulation 6(2)]

Name of the Company : Chandni Machines Limited
ISIN of the company : INE01GZ01011

**Details of Securities held by Promoter, Key Managerial Personnel (KMP), Designated Person, Director
and other such persons as mentioned in Regulation 6(2)**

Name, PAN no., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP/ Directors/ Designated Person/ immediate relatives/ other setc)	Securities held as on the date of regulation coming into force		% of Share holding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option contracts held as on the date of regulation coming into force	
		Type of security (for eg.- Shares, Warrants, Convertible Debentures etc)	No.		Number of units (contracts* lot size)	Notional value in Rupee terms	Number of units (contracts* lot size)	Notional value in Rupee terms
1	2	3	4	5	6		7	

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Signature:

Designation:

Date:

Place:

**ANNEXURE- VII
(FORM B)**

FORMAT FOR DISCLOSURE OF CHANGE IN SHAREHOLDING

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015
[Regulation 7(1) (b) read with Regulation 6(2)]

Name of the Company : Chandni Machines Limited
ISIN of the company : INE01GZ01011

Details of Securities held on Appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a Listed Company and other such persons as mentioned in Regulation 6(2).

Name, PAN no., CIN/DIN & address with contact nos.	Category of Person (Promoters / KMP/ Directors/ immediate relatives/ others etc)	Date of Appointment of Director/ KMP or date of becoming Promoter	Securities held at the time of becoming Promoter/ appointment of Director/KMP		% of Share holding	Open Interest of the Future contracts held at the time of becoming Promoter/ appointment of Director/KMP		Open Interest of the Option contracts held at the time of becoming Promoter/ appointment of Director/KMP	
			Type of security (for eg.- Shares, Warrants, Convertible Debentures etc)	No.		Number of units (contracts* lot size)	Notional value in Rupee terms	Number of units (contracts* lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8		

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Signature:

Designation:

Date:

Place:

**ANNEXURE- VIII
(FORM C)**

FORMAT FOR DISCLOSURE OF CHANGE IN SHAREHOLDING

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015
[Regulation 7(2) read with Regulation 6(2)]

Name of the Company : Chandni Machines Limited
ISIN of the company : INE01GZ01011

Details of change in holding of Securities of Promoter, Employee or Director of a Listed Company and other such persons as mentioned in Regulation 6(2).

Name, PAN no., CIN/DIN & addresses of Promoter/ Employee/ Director with contact nos.	Category of Person (Promoters/ KMP/ Directors / immediate relatives/ others etc)	Securities held prior to acquisition/disposal		Securities Acquired / Disposed				Securities held Post acquisition/ disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/public rights/preferential offer/ off market/ Inter-se transfer etc)	Trading in derivatives (Specify type of contracts, Futures or Options etc)				Exchange on which the trade was executed				
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg.- Shares, Warrants, Convertible Debentures etc)	No	Value	Transaction Type (Buy/sale/Pledge/Invoke)	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To			Type of Contract	Contract Specifications	Buy	Sell		Value	Number of units (contracts* lot size)	Value	Number of units (contracts* lot size)
																Value	Number of units (contracts* lot size)					
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21		

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Signature:
Designation:

Date:
Place: